Doc Code: AP.PRE.REQ

PTO/SB/33 (07-05)
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PRE-APPEAL BRIEF REQUEST FOR REVIEW

Docket Number (Optional)
2002-0978 / 24061.43

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on 6-1-06

Signature Bonnie Boyle

Typed or printed name Bonnie Boyle

Application Number 10/680,664	Filed October 7, 2003
First Named Inventor Yian-Liang KUO	
Art Unit 2826	Examiner Williams, Alexander O.

Applicant requests review of the final rejection in the above-identified application. No amendments are being filed with this request.

This request is being filed with a notice of appeal.

The review is requested for the reason(s) stated on the attached sheet(s).
Note: No more than five (5) pages may be provided.

I am the

☐ applicant/inventor.

☐ assignee of record of the entire interest.
See 37 CFR 3.71. Statement under 37 CFR 3.73(b) is enclosed. (Form PTO/SB/96)

☑ attorney or agent of record.
Registration number 55,272.

☐ attorney or agent acting under 37 CFR 1.34.
Registration number if acting under 37 CFR 1.34 ________

Signature

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June 1, 2006
Date

NOTE: Signatures of all the inventors or assignees of record of the entire interest or their representative(s) are required. Submit multiple forms if more than one signature is required, see below*.

☑ *Total of one (1) forms are submitted.

This collection of information is required by 35 U.S.C. 132. The information is required to obtain or retain a benefit by the public which is to file (and by the USPTO to process) an application. Confidentiality is governed by 35 U.S.C. 122 and 37 CFR 1.11, 1.14 and 41.6. This collection is estimated to take 12 minutes to complete, including gathering, preparing, and submitting the completed application form to the USPTO. Time will vary depending upon the individual case. Any comments on the amount of time you require to complete this form and/or suggestions for reducing this burden, should be sent to the Chief Information Officer, U.S. Patent and Trademark Office, U.S. Department of Commerce, P.O. Box 1450, Alexandria, VA 22313-1450. DO NOT SEND FEES OR COMPLETED FORMS TO THIS ADDRESS. SEND TO: Mail Stop AF, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450.

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REPLY UNDER 37 CFR §1.116
EXPEDITED PROCEDURE
GROUP ART UNIT 2826

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re application of: Yian-Liang KUO, et al.	§ § §	Attorney Docket No. 24061.43
Serial No.: 10/680,664	§ §	Customer No. 42727
Filed: October 7, 2003	§ §	Group Art Unit: 2826
For: Integrated Circuit Package Bond Pad Having Plurality of Conductive Members	§ §	Examiner: Williams, Alexander O.

REASONS IN SUPPORT OF PRE-APPEAL BRIEF REQUEST FOR REVIEW

Mail Stop AF
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Please consider the following reasons in support of the concurrently filed Pre-Appeal Brief Request for Review.

Reasons

Applicants submit the following reasons demonstrating that there is clear error with respect to the Examiner's rejection of claims 1, 3 and 5-11, 13-15, and 17-20 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,803,302 to Pozder, et al. ("Pozder").

Claim 1

The PTO provides in MPEP §2131 that "to anticipate a claim, the reference must teach every element of the claim." Therefore, to support a rejection of claim 1, Pozder must contain all of the elements of claim 1.

Pozder discloses, and depicts in Fig. 2:

- a conductive bond pad 134 formed in an interlevel dielectric layer 130,
- a dielectric passivation layer 136 having portions removed to form dielectric support structures 138, and
- a conductive capping layer 204 formed over the dielectric passivation layer 136, including portions extending between the dielectric support structures 138 to contact the conductive bond pad 134.

Pozder also disclose, and depicts in Fig. 3:

- dielectric studs 302 positioned beneath the dielectric support structures 138 within the conductive bond pad 134.

However, Pozder does not disclose that the conductive capping layer 204 can comprise a plurality of discrete conductors separated by portions of the dielectric passivation layer 136 (the dielectric support structures 138). That is, Pozder only discloses that the conductive capping layer 204 is a single discrete conductive member, merely having portions extending between the dielectric support structures 138. Pozder fails to disclose that the portions of the conductive capping layer 204 which extend between the dielectric support structures 138 comprise a plurality of discrete conductors.

Consequently, Pozder necessarily fails to disclose "an electrode located over the insulating layer and having a plurality of discrete conductors separated by portions of a dielectric layer," as recited in claim 1 of the present application.

Moreover, Pozder fails to disclose that each of the portions of the conductive capping layer 204 extending between the dielectric support structures 138 has a surface configured to be bonded to external circuitry. In contrast, each of the portions of the conductive capping layer 204 extending between the dielectric support structures 138 are configured to be indirectly connected to external circuitry by the bulk portion of the conductive capping layer 204 overlying the dielectric passivation layer 136.

Therefore, Pozder also necessarily fails to disclose that each of the portions of the conductive capping layer 204 extending between the dielectric support structures 138 "has a first surface configured to be bonded to external circuitry" in the context of claim 1 of the present application.

For at least these reasons, the §102(e) rejection of claim 1 is not supported by Pozder. Accordingly, Applicants respectfully request the withdrawal of the §102(e) rejection of claim 1 and its dependent claims.

Claim 11

To support a rejection of claim 11, Pozder must contain all of the elements of claim 11. However, as also described above, Pozder fails to disclose an electrode located over an insulating layer and having a plurality of discrete conductors separated by portions of a dielectric layer, in the context of claim 11 of the present application. Moreover, Pozder also fails to disclose an electrode having a plurality of discrete conductors that each have a surface configured to be bonded to external circuitry, in the context of claim 11 of the present application. For at least these reasons, the §102(e) rejection of claim 11 is not supported by Pozder. Accordingly, Applicants respectfully request the withdrawal of the §102(e) rejection of claim 11 and its dependent claims.

Claim 15

To support a rejection of claim 15, Pozder must contain all of the elements of claim 15. However, as also described above, Pozder fails to disclose an electrode located over an insulating layer and having a plurality of discrete conductors separated by portions of a dielectric layer, in the context of claim 15 of the present application. Moreover, Pozder also fails to disclose an electrode having a plurality of discrete conductors that each have a surface configured to be bonded to external circuitry, in the context of claim 15 of the present application. For at least these reasons, the §102(e) rejection of claim 15 is not supported by Pozder. Accordingly, Applicants respectfully request the withdrawal of the §102(e) rejection of claim 15 and its dependent claims.

Conclusion

It is clear from all of the foregoing that independent claims 1, 11 and 15 are in condition for allowance. Dependent claims 3-10, 13, 14 and 17-20 depend from and further limit independent claims 1, 11 and 15 and, therefore, are allowable as well.

Accordingly, it is respectfully submitted that all the claims in the present application are in condition for allowance.

Respectfully submitted,

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Dated: 6/1/06
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